

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:
NELSON VARGAS CORDERO
MARY J. RODRIGUEZ QUIÑONES

Debtors

IN RE:
NELSON VARGAS CORDERO
MARY J. RODRIGUEZ QUIÑONES

Plaintiffs

vs.

COOPERATIVA DE AHORRO Y CREDITO
NUESTRA SEÑORA DE LA CANDELARIA; X,
Y, and/or Z INSURANCE CO.; JOHN DOE AND
JANE ROE

Defendants

JOSE CARRION MORALES
CHAPTER 13 TRUSTEE/PARTY IN INTEREST
CASE 11-02484-BKT

Case No. 98-10612 (ESL)

CHAPTER 13

Adv. No. 11-00151- ESL

VIOLATION OF DISCHARGE
INJUNCTIVE RELIEF / CONTEMPT
/ DAMAGES

MOTION FOR FINAL EXTENSION OF TIME

TO HONORABLE COURT:

Come now, Cooperativa de Ahorro y Crédito La Candelaria (hereinafter Candel Coop), that respectfully states, prays, and requests as follows:

On June 11, 2012 we requested an extension of time to submit the Opposition to the Motion for Summary Judgment until June 20, 2012. We are almost finished in the preparation of the Opposition and the brief but for the reasons set forth herein we need an additional

extension of time to be able to submit an affidavit that it is essential for the defense of Cooperativa La Candelaria. The witness who will provide the affidavit is attorney Luis Nazario Maldonado who represented the Defendant in the Superior Court of Vega Baja, in a civil action that pertains to the complaint in the case at bar. We had already discussed the contents of the statement with attorney Nazario, whose office is now located in Arecibo, Puerto Rico, but he has not had a chance to verify his legal file in that matter that forms part of his dead files to make sure that his statement is going to be accurate and correct. We conferred with him today and he has made a commitment to verify his file and his notes within the upcoming two days to make sure that the account of the facts recalled by him and provided to us is accurate to submit his statement for the filing in this case. Accordingly, a short extension of time is requested until June 25, 2012.

WHEREFORE, it is respectfully requested from the Court to deny Plaintiffs' motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th day of June, 2012.

I hereby certify that on this same date a true and exact copy of this motion was sent to Edwin Matos Maldonado and Felix Zeno Gloró through the Electronic Case Management System just as to: Nancy Pujals, Esq.- nancy.pujals@usdoj.gov; Monsita Lecaroz, Esq. - monsita.lecaroz@usdoj.gov.

S/CYNTHIA NAVARRO PAGAN
CYNTHIA NAVARRO PAGAN
U.S. Id. 203602
C/7 N. E. #344, Suite 2-B
Esq. Franklin D. Roosevelt
San Juan, Puerto Rico 00921
Tel.: (787) 792-2955

S/ROBERTO MALDONADO NIEVES
ROBERTO MALDONADO NIEVES
U.S. Id. 202209
C/7 N. E. #344, Suite 1-A
Esq. Franklin D. Roosevelt
San Juan, Puerto Rico 00921
Tel. (787) 782-3221

